



## BOSTON HARBOR ISLANDS

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S u n d a y

**Federal Official**  
George E. Borge, Jr. M.A.

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Park Information

6 1 7 . 2 2 3 . 8 6 6 6

*A national park area*

### Boston Harbor Islands Advisory Council

July 28, 2000

Mr. George Price, Project Manager  
Boston Harbor Islands National Park Area  
408 Atlantic Avenue  
Boston, MA 02110

Re: Boston Harbor Islands National Park Area  
Draft General Management Plan and Draft Environmental Impact  
Statement  
EIS No. 000161

Dear George:

We are pleased to submit the comments of the Boston Harbor Islands  
Advisory Council on the Draft General Management Plan and Draft  
Environmental Impact Statement for the Boston Harbor Islands National  
Park Area.

As you know, the Advisory Council has been actively involved throughout  
the process of preparing the Draft General Management Plan. The thoughts  
and perspectives of our members and their constituencies have helped to  
shape the content of the plan from its earliest stages. At this point in the  
process our comments focus on points that deserve greater emphasis or on  
topics which would benefit from additional information.

The Advisory Council's comments were developed through an extensive  
process that included eight community meetings hosted by the Council,  
focused discussions conducted by each of the Council's seven interest  
groups, and individual contributions by members based on their own  
review of the document. The outputs of all of these efforts were compiled  
and discussed by the Council at a special meeting on July 12, 2000. Our  
comments are organized into several sections that reflect the emphasis the  
Council wishes to express. General comments are those that are widely  
endorsed across all interests represented on the Council. Other comments  
are listed by Interest Group, not to suggest they are any less important, but  
because they more closely relate to the particular perspective of an Interest  
Group. Comments of the Council that could be characterized as minor  
editing and technical corrections have been submitted previously to the  
Planning Committee to be addressed informally.

accorded the tribes by federal legislation. It is anticipated that that process will produce formal comments of the Native Americans.

The Partnership, the Planning Committee, and the members of the National Park Service Planning Team, notably Barbara Mackey from the Boston Support Office and Bruce Jacobson and yourself from the Boston Harbor Islands Office, along with the others involved with researching and producing this document, deserve praise and congratulations for conducting a thorough and open planning process. The Draft GMP/EIS is, on the whole, very well done and captures the essence of what the public, the Partners, and the Advisory Council have been discussing and supporting.

#### **GENERAL COMMENTS**

##### **Financing the Park**

The General Management Plan needs to be implementable and this comes down to funding, both capital and operations. Implementation of this plan is estimated to be \$7 to 9 million per year in operating costs and over \$66 million in infrastructure needs.

The Council strongly recommends that the plan more clearly describe the means by which the level of funding needed to implement the plan can realistically be secured. It is felt that this should be presented as a formula which includes a substantial role for the state and federal governments, a percentage that might be expected to come from cities and towns, an amount that the Island Alliance would be expected to raise, as well as the role of economic development and revenue generation. The plan should be more specific regarding the strategy that will be needed to ensure adequate state support and to allow the needed financial coordination among the Park's Partners to support island activities and programs and maintain and restore island facilities and ecosystems. Included should be a discussion of the potential applicability and use of the Massachusetts Environmental Joint Powers Agreement (chapter 491 of the Acts of 1996) for facilitating the joint management and financing of the Park.

The General Management Plan should mention that the Island Alliance is spearheading the preparation of a separate Economic Development Plan. This plan will offer details of implementable opportunities for revenue generation.

##### **Implementing the General Management Plan**

The General Management Plan is a policy plan that serves as the long-term framework for development and operation of the park. Implementation of the GMP is dependent on the findings and recommendations of the more recently-initiated Strategic Plan, Economic Development Plan, and Interpretive Plan. The public should have even more opportunities to comment and participate as these specific plans and studies are developed and completed.

- The final general management plan contains a new section on park financing (GMP p.85), which addresses this point. The plan also states the intention that major infrastructure expenses will be paid from public funds, but that funding strategies and specifics of funding are the purview of implementation plans such as the five-year strategic plan. Because public agencies generally are prohibited from committing funds in advance of appropriations, is not possible to determine proportional contributions from federal, state, and local agencies in a long-range plan such as a general management plan.
- The economic development plan developed by the Island Alliance on behalf of the Boston Harbor Islands Partnership is summarized in Appendix 12 (GMP p.139).
- Explicit reference is made (in the policy statement on management planning, GMP p.84) to the Advisory Council as leading public reviews of park plans.

**Boundaries of the park**

Though the federal legislation creating the park does not include the watershed surrounding the islands within the boundary of the park (as does the state legislation for the state park), activities occurring on and in the water do affect the islands.

The National Park Service (NPS), the Massachusetts parks agencies, and the other Partners in the park need to take full advantage of their many and varied statutory and administrative powers to ensure that management of the watershed is fully integrated into the management of the Park. This management will manifest itself in decisions about shellfishing, aquaculture, pier construction, natural resource protection, cultural heritage preservation, and expanded human use of the Park and the waters surrounding the Harbor Islands.

In particular, the management of the watershed needs to emphasize high quality ferry access to the islands, ensuring that hub islands have the infrastructure to accommodate high volume service and that the other islands designated as appropriate for public visitation should be truly accessible to the public through proper maintenance of the piers. Decisions about moorings and other facilities for private boaters need to be made openly, clearly and as part of a larger framework of access and land use planning.

**Boston Harbor as an Estuary**

The General Management Plan makes inadequate reference to the significance of Boston Harbor being an estuary. The islands are situated within this estuary and, as such, are part of an extremely important and productive ecosystem that includes the watersheds, Boston Harbor, Massachusetts Bay, Stellwagen Bank, Gulf of Maine, and the Atlantic Ocean. This interrelatedness of the ecosystem should be highlighted as an interpretive theme of the Park.

**Long-term vs. Short-term**

As a policy document, the Draft General Management Plan is meant to present long-range, general direction for the park. In some instances, the plan assumes the long-term continuation of certain uses on specific islands, such as the police firing range on Moon Island, a potential safety and environmental problem. The plan should outline a continuing process for evaluating the appropriateness of such uses of the islands.

**Universal Access**

Emphasize the importance and commitment to programming and designing this park to be usable by all people. Access and design should be seamlessly integrated.

**Water Transportation**

The future viability of the islands park will be most dependent upon a reliable and expanded marine transportation system including user-

- A new section in the final plan is a "Harbor Management" policy (GMP p.96) under the goal for partnership management and operations. Also, Appendix 17 (GMP p.156), Agencies' Roles in Resource Protection and Public Safety, has been added to the final plan.
- The plan now contains several references to the estuary: in the park setting (GMP p.3) and in the themes (GMP p.47). In addition, the themes have been elaborated in Appendix 18 (GMP p.161), where two of the four themes include emphasis on estuaries.
- In the GMP section of management planning under the management and operations goal (GMP p.84), amending and updating the general management plan is explained and further referred to regarding the strategic plan.
- The accessibility policy under the goal of visitor access, use, and enjoyment (GMP p.74) has been expanded and made more clear.
- The map name was changed to clarify that it shows "park transportation" (GMP p.23)

friendly shore-side intermodal transportation links. Just as the Plan's maps show land-based public transit stops, commuter boat routes with its terminals should be shown.

#### **Concessions Policy**

The General Management Plan should present, or at least indicate a need for a standardized concession policy (e.g. permitting, leasing, enforcement, required percentage contributions to the BHINPA general fund, etc.) for the Park as a whole. Predictability and fairness of competition throughout the entire park system is essential; there must always be open, honest contracting for services.

#### **INTEREST GROUP COMMENTS**

The following comments reflect specifically the perspectives of the Interest Groups. Written memoranda prepared by the Interest Groups as part of the Council's review process are appended to this letter as reference and might be useful in providing clarification.

##### **Boston Harbor-related Advocacy Groups**

Related to the comment above regarding a continuing open process for evaluating uses on the islands, it would be productive to further examine the potential future reuse of the MDC-owned cottages on Peddock's Island.

##### **Business and Commercial Entities**

The Park generated revenue "engine" will take time to become established and productive. Initially, corporate/foundation donations and government funding support will be needed to jump start revenue generating initiatives. Once a critical mass of activities and programs (presumably attracting an increasing number of visitors) exist on the islands, we can anticipate a corporate shift from donations to investment.

Revenue generation at the Park's shore-side "gateways," on Georges Island, and sales on board the boats carrying visitors to, from and between the islands offer the best near-term opportunities. For different reasons, Thompson, Long, Spectacle and Peddock's Islands appear to offer the most potential for revenue generating activities/programs and facilities within the park area.

The Plan should suggest looking at establishing close ties with the new Boston Convention Center. Its proximity to one of the Islands' major gateways should offer excellent revenue-generating opportunities. Similarly, Quincy Market's 11 million annual visitors and its proximity to another major gateway also deserve special focus.

Consideration should be given to attracting a major donor (corporate, foundation, individual) willing to "adopt" the islands (or island) and to sponsor major programs.

- Throughout the general management plan additional emphasis has been placed on common practices and standardization of procedures and practices among the various owners. Contracting is carried out under existing federal, state, and municipal laws, depending on the agency doing the contracting. At all levels of government there are contracting laws to protect the public in the use of public funds. The contracting process includes accountability to the public.
- The policy of the MDC to evaluate each cottage for potential reuse and historical significance was clarified on page 19 of the GMP.
- The ideas in these paragraphs have been included in the park's strategy for economic sustainability developed by the Island Alliance on behalf of the Partnership and summarized in Appendix 12 (GMP p.139).

For the Park to become a major visitor draw, a dramatic/compelling attraction needs to be identified or developed (e.g. an "Alcatraz"). Boston Light, Fort Warren and Deer Island are possibilities or it may require new construction (e.g., a Native American museum, Black History monument, etc.). This major attraction should then serve as a central icon for marketing the park.

Charrettes would be an excellent mechanism to explore revenue-generating opportunities. The charrettes should include knowledgeable members of various business groups, e.g., from food service, retail sales, major attraction operations, recreational programs, tours, banking, real estate development, chamber of commerce, etc. This initiative should be included as part of the Island Alliance's work on the Economic Development Plan.

Agree with the General Management Plan's designation of the Island Alliance as "the preferred vehicle for revenue generation, expenditure, and financial management in support of other Partnership members" (pg. 45). This non-profit organization appears to be the most logical (and least encumbered) choice as clearinghouse for capital and operating funds generated or designated for the general benefit of the entire park area.

The GMP should mention the potential small business and job opportunities the islands will offer for communities surrounding the new park area.

#### **Community Groups**

Easy accessibility and affordability is of paramount importance. Gateways should be planned so as to be convenient to centers of population. A gateway at or in the vicinity of the JFK Library in Dorchester is encouraged and supported. Access to the islands must be kept at a cost affordable to families and young people.

The Plan's policies and recommendations for activities and facilities should accommodate and encourage visitation by youth.

The General Management Plan should mention the potential of the islands to provide vocational and educational opportunities. Knowledge about the islands and the harbor should be a component of every job description that relates to the Park.

It should be clear that the plan is a living and flexible document that allows modification as time passes. Young people will inherit the park and the plan should anticipate and accommodate new ideas being developed in the future.

- The GMP section of economic activity under the goal of partnership management and operations has been expanded and is now called private economic activity (GMP p.87).
- Explicit mention is made about encouraging youth to visit the park in the Visitor Access policy (GMP p.73).
- In the section of management planning under the management and operations goal, amending and updating the general management plan is explained and further referred to regarding the strategic plan (GMP p.84).

### **Educational and Cultural Institutions**

The General Management Plan should include as a goal that every child in public school in the area should get to the islands as part of his/her educational experience.

The interpretive plan and estuary theme are both seen as important issues. A survey of animals and plants on the islands as well as an up to date listing of species of special concern should be developed.

The General Management Plan is clear about limiting its scope to the impact of proposed changes on the specific islands, but it is difficult not to talk more about inter-related activities and impacts such as airplane noise (including the projected increase of flights over the islands from proposed expansion at Logan Airport), public/private use of waters surrounding the park area, air quality, etc. The islands don't exist in isolation and the park experience is undeniably affected by external activities.

Sustainability and the use of green technology deserve greater discussion in the plan. It is a fundamental concept for this park and one particularly well-suited to the island environment.

### **Environmental Organizations**

Decisions about what historic resources on the Harbor Islands should be preserved should be made in an open and public manner. Fort Andrews on Paddock's in particular seems to hang in limbo with no clear determination of whether it is a historic resource to be preserved or a series of dilapidated buildings occupying land that could be used for a higher and better purpose.

It is difficult to comment on the Draft EIS without an up-to-date Natural Resource Inventory. The Draft EIS makes conclusions about the relative impacts of the three alternatives in the absence of all but the most general information about the environment.

Explicitly protect salt marshes in the park. Adopt a policy of no degradation or destruction of existing marshes; foster new marshes. Identify significant intertidal zones on the islands and protect, preserve, present these special places.

Include the story of sea level rise due to climate change.

Relate the impact of past, present and future human uses on habitat.

Before any contract is awarded, certain steps need to be followed: (1) there should be a clear and public articulation of the goals for the contract, (2) a widely disseminated public Request for Proposals (RFP) clearly describing the project and the goals behind it, and (3) the review and decision making concerning the selection, negotiation and awarding of all contracts should be open (to the maximum extent possible) leaving no doubt that the contractor who can best achieve the

- The plan now contains several references to the estuary: in the park setting (GMP p.3) and in the themes (GMP p.47). In addition, an interpretive plan has been added as Appendix 18 (GMP p.161). Two of the four themes include emphasis on estuaries.
- The draft plan called for cooperation and coordination to address estuary threats. In addition, a clarification of the policy concerning airport noise is contained in a new section, Logan International Airport, under the goal of external cooperation (GMP p.97). A "Harbor Management" policy (GMP p. 96) was also added for clarification.
- An expanded section now called sustainability and environmental leadership is found under the goal of partnership management and operations (GMP p.89). Also, the section on energy management and recycling has been expanded.
- The sections of general natural resource management (GMP p.59) and restoration of natural systems (GMP p.60) have been expanded. Salt marshes are included among these sections although they are not highlighted.

goals articulated at the beginning of the process are best met.

Little or no mention is made of kayak use of the islands. This is a growing segment of recreation that seems perfectly consistent with the park and should be encouraged. It is also related to the issue of watershed management mentioned above and to launching access for other small boats (also not covered in the plan).

Fishing piers – a major benefit of the cleaning of Boston Harbor should be the increased popularity of fishing. Indeed, one need only look at the use of the Castle Island fishing pier to realize the popularity of this activity. No discussion of providing additional facilities for fishing was noted in the plan.

#### **Municipalities**

Issues related to moorings, recreational boaters, and commercial fishing interests require additional attention in the General Management Plan. There is concern regarding conflicts among users of the watershed, specifically between proposed mooring fields and commercial lobster fishing. How will these issues be addressed?

Concern over communications/safety coordination of agencies that have responsibilities for the islands and the harbor waters.

Communities expressing a desire to be a gateway and willing to contribute toward establishing a gateway consistent with the standards of the Park should have the opportunity to do so. More gateways are preferred to fewer gateways.

#### **Native American Interests**

A Native American Center would be a great way to educate the public and students on a variety of subjects. The Center would fit well into every school's curriculum.

The Native American story and perspective can be incorporated in a variety of effective ways: interpretive centers, videos, dioramas, exhibits and signage on many islands. Identification signs for vegetation could include the Indian name and the uses for the plant, for example. A village on one island would be an attraction for visitors.

The General Management Plan should mention a specific tribe's name whenever appropriate; the Plan now only references Native Americans in general. For example, King Philip is not even identified as a Wampanoag.

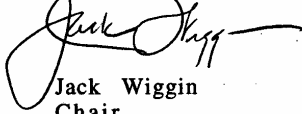
The Wampanoags and the Nipmucks and the Massachusetts (no known living descendants) were the primary victims of the King Philip's war. The descendants of those tribes should provide the history.

The plan should elaborate more on the pre-colonial uses of the islands.

- Under Park Access and Circulation Systems, a new section on other water access (GMP p.78) addresses small boats.
- In a new policy, "Harbor Management" (GMP p.96), fishing is stated expressly as an activity for park visitors. Plans for specific facilities would come from a subsequent implementation plan.
- These issues are addressed in a new policy, "Harbor Management" (GMP p.96).
- Appendix 17 (GMP p.156), Agencies Roles in Resource Protection and Public Safety has been added to summarize the responsibilities of the multiple agencies working in the harbor.
- The section on gateways has been expanded (GMP p.49). The plan lays out guidelines for selecting gateways and leaves up to the Partnership and relevant communities the details of gateway development.
- Specific tribe names have been added wherever they could be ascertained.
- The plan now contains a new section in the overview, Native Americans and the Islands (GMP p.4) which treats the subject of the pre-Contact period.

In closing, the Advisory Council has been pleased to be part of the process of preparing this plan and looks forward to continuing to assist in the planning and implementation of this national park area.

Sincerely,



Jack Wiggin  
Chair



Suzanne Gall Marsh  
Vice-Chair

Attachments:

Schedule of community meetings

Memoranda prepared by the interest groups





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

## Environmental Protection Agency

July 28, 2000

George Price, Project Manager  
Boston Harbor Islands  
408 Atlantic Avenue, Suite 228  
Boston, Massachusetts 02110-3349

Re: Draft General Management Plan/Draft Environmental Impact Statement for the Boston Harbor Islands National Park (EPA ERP # NPS-B61024-MA)

Dear Mr. Price:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft General Management Plan/Draft Environmental Impact Statement (DEIS) for the Boston Harbor Islands National Park in Boston, Massachusetts.

Based on our review of the DEIS we have no objections to the project as described and we rate this EIS "LO-1 - Lack of Objections-Adequate" in accordance with EPA's national rating system, a description of which is attached to this letter. We support the National Park Service's (NPS) management plan focus on the resources of the harbor islands and believe that continued public involvement will be necessary to reach consensus on a variety of decisions that will determine the future of the park. Moreover, we encourage the NPS and the Boston Harbor Islands Partnership to continue to develop and promote incentives to attract visitors to the harbor islands via public transportation. With an appropriate management plan in place, visitors will be able to take advantage of the revitalized harbor and will help to build the reputation of the harbor islands as one of New England's great treasures.

We appreciate the opportunity to comment on this DEIS. Please feel free to contact me or Timothy Timmermann at 617/918-1025 if you wish to discuss these comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Mindy S. Lubber", is positioned above the typed name.

Mindy S. Lubber  
Regional Administrator

Attachment

Toll Free • 1-888-372-7341  
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## COMMENT

## NOTES on EIS and GMP CHANGES

	Edith Andrews Aquinnah Wampanoag
	General Management Plan Draft
	Recommended Changes
pg 1 3rd P 3rd sent.	The legislation, also, dictates that the park managers must consult with the Indian Tribes that were involved in the King Philip's War.
pg 1. 3rd sent.	The reason for deleting the word "Recreation" from the Col 7 and P title was because the Boston Harbor Islands served as concentration camps in the 1670's for the victims of the King Philip's War. The descendants of the Indian Nations that were involved in the King Philip's War strongly voiced their opposition to the word "Recreation" and believed it was inappropriate and disrespectful to their ancestors that were incarcerated, died and buried on those islands.
pg 1 The Region 2nd P 4 <sup>th</sup> sent	To the south ..... in the Northeast and a Wampanoag Indian Summer Village (Encampment),
pg 6 Upland Veg. 2nd P 1st sent.	Pre-colonial contact the American Indians were known by their Tribal Nations. They utilized the fertile harbor islands to plant their crops of corn, beans and squash, also gathered wild berries and various other vegetation for food and (10FC)

## Aquinnah Wampanoag, Edith Andrews

- The plan now explicitly mentions in a policy section that among areas of Native American consultation are programs to protect and preserve Indian historic sites (GMP p.96), in addition to other areas noted in the draft GMP.
- The plan has clarified this point (GMP p. 1).
- Summer village has been added (GMP p.3).
- A new section, "Native Americans and the Islands" has been added to the Park Overview (GMP p.4), which includes Native American use of vegetables.

	General Management Plan Draft	Edith Andrews
	and medicinal plants and herbs.	
Wildlife	The Indians hunted the abundance of animals and fowl on the islands the food source was plentiful.	
Marine	The American Indians enjoyed the harbor they were expert fishermen the harbor waters yielded an enormous varieties of fish, mammals and shellfish; the fruits of the sea were the staples of the Native American Indians' diets in the Northeast Region.	
p 7 and Col. Cullum 1st P 2nd sent Document	The Indians continued their traditional way of life on the islands. Years later, when the early English settlers arrived the Indians introduced them to the islands.	
p 7 and Col. 3rd sent Delete the beginning of sentence (parts were)	The American Indians inhabited the islands from early spring to very late autumn they cleared the fields and parts of the forests to plant their crops and continued the practice until the Euro-American settlers kept encroaching on their land then the Indians no longer were able to enjoy their island havens.	
pg 8 1st Col 1st P 2nd P Delete 3rd sent Include sentence	On Deer Island and all the other harbor islands that were once havens of pleasure and enjoyment for the Indians became the locations of tragic imprisonment of the Christian Indians and the Traditional Indians during the King Philip's War. This period marks an inhumane chapter in this region's history. The descendants of the Indians Nations and Tribes that were involved in the King Philip's War are adamant that their stories must be told about our First Holocaust in the 1670's.	

(2 of 6)

- See new section, "Native Americans and the Islands" (GMP p.4).
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## COMMENT

## NOTES on EIS and GMP CHANGES

pg 8 Arch site  
just add  
5th sent. The American Indian members of the Advisory Council of the Boston Harbor Islands National Park Area will enforce the legislation to insure the protection of the Indian burial grounds and sacred sites of their ancestors. A very necessary and important program for the park managers and employees is "Cultural Sensitivity."

pg 8 line down  
Delete  
the section  
American history  
the colonial  
Pre-colonial contact

pg 8 add  
to picture  
identification Supreme Sachem of the Wampanoag Nation

pg col 2  
last sent. died from lack of food, water, clothing, shelter and medicine.

pg 9 Question 1st sentence - King Philip's War ended August 1676  
skirmish continued - so it would be unlikely to have released the Indians in May. "documentation needed." since some books indicate the war probably lasted until 1678 because the news had not reached all the war areas about King Philip's death

pg 27 1st col.  
Sub-theme add  
to 1st bullet. This abuse committed by the English colonists against the Indian population was our First Holocaust in the Massachusetts Bay Colony.

pg 28 Sub-theme  
add bullet  
The American Indian have been working to maintain and reclaim their burial grounds, historic and sacred sites on the Boston Harbor (9 of 6)

- New language has been added in the context section of resource protection policies to address the concern stated here. The language includes, "In future, Indian tribes will be vigilant to ensure protection measures and applicable laws and policies are enforced." Furthermore, it states, "Park managers have to be much more 'culturally sensitive' to American Indians' participation than managers have been in the past" (GMP p.58).
- Prehistoric has been changed to "Pre-Contact" throughout.
- A new illustration caption identifies Metacom (King Philip) as a Wampanoag (GMP p.4).
- See "Native Americans and the Islands" in Park Overview (GMP p.4).
- See "Native Americans and the Islands" in Park Overview (GMP p.4).
- The following language has been added to the description of ethnographic sites: "The descendants of Indian nations and tribes that were involved in the King Philip's War are adamant that their stories be told about what they consider a holocaust in the 1670s" (GMP p.15).
- The appendix contains a long range interpretive plan which addresses this comment under the sub-theme, "Connecting to Native American Heritage" (GMP p.164).

p.28 Islands. The islands and their management provide educational programs to increase awareness between Native and non-Native communities.

p.29 Overview There are seven mission goals for the Boston Harbor Islands last sent, 1st col.

p.29 2nd col. Native American Tribes and 2nd sent.

p.30 context Europeans fractured American Indian cultural systems. 1st col. 3rd P 7th line.

p.34 col. 2 appropriate state agencies including the state historic preservation office, Tribal Historic Preservation Office, professional archeologists and Tribal Repatriation Officer. Burial Sites 12th line add to last sent

p.36 1st Col. and the Indian Tribes 2nd P 5th sent add to sent.

p.66 2nd col. No permission will be granted for independent research that Policies 1st sent. would physically disturb cultural resources for the collection of objects or specimens.

p.37 col. 1 The Partnership will not take nor allow any action to be taken last sent. that would possibly destroy cultural resources without the permission of all the Indian Tribes

p.37 2nd col. 1st All objects collected become part of the park's <sup>MUSEUM</sup> collection must be. last sent. (4 of 6)

- The Mission Goals for the Boston Harbor Islands National Park Area follow the six categories of goals for units of the national park system. For this GMP mission goals were defined early in the planning process, which involved ongoing public consultation, and have provided a comprehensive structure for the entire plan.
- The word was changed from "destroyed" to "fractured" (GMP p.58).
- Language in the policy on burial sites and cemeteries has been changed and now includes tribal historic preservation officers among other changes (GMP p.64).
- The reference is to the responsibility for management of ethnographic resources. The following has been added to the policy on preservation of data and museum collections: "In particular, for resources related to American Indian tribes, the Partnership seeks the views of tribal representatives as to a course of action. (Burial sites are treated separately in a resource protection policy on page 65 of the GMP.) All research data and objects collected become part of the park museum collection, which is held by various Partnership agencies, and others" (GMP p.70).
- Concerning collection of objects, in general, permission is not given except by permit. A more fully developed policy statement has been written in the GMP (GMP p.70).

identified with complete data and reported under the NAGPRA law to be repatriated by the Indian Tribes.

pg 44 col 2  
Evaluating  
last sent in  
section

The park will operate in compliance with the Native American Graves Protection and Repatriation Act (NAGPRA) and its regulations and relevant tribal laws. The park will hold to NAGPRA standards as a federal undertaking regardless of its limited ownership of the islands. The other island owners are also bound because they are funded by federal dollars.

pg 51 col 1  
col 2 add to  
3rd bullet  
from bottom

Historic area historic sites Sacred Sites  
Indian historic sites & area

- "Indian historic sites" has been added to Special Overlay Protection areas of the Management Areas (GMP p.51).

pg 57  
Research and  
hist sent

(include on page 57) American Indian Tribes must be consulted before beginning an archeological investigation and ethnographic studies on Indian Tribes.

Page 58 contains some of my mission statements

pg 61 1st col  
& 2nd col

Indian Burial Grounds (should be included on all islands)

pg 110 2nd col  
1st & last sent

Federal Regulations require that archeological resources are protected.

pg 123

From page 123 - 131 The story & history of the American  
(G.F.P.)

Indian should be woven into the study. The islands were havens for the Indians, the public should be made aware of it. The islands were where the Natives lived from spring until fall. (Especially the Wampanag.)

Years later when the war broke out the islands became concentration camps much to the horror of the Indians.

pg 141 1st col and 3rd sent. after documentation The reason that there are no physical evidences of camps and burials because of the irresponsible excavation of the island "Deer Island" in order to provide the city of Boston with a sewerage facility. Most of the American Indian graves were dug up and deposited elsewhere without any regard or respect.

(6 of 6)

- A section, "Native Americans and the Islands" has been added to the Park Overview (GMP p.4).

Friday, August 25, 2000

George Price  
National Park Service Project Manager  
Boston Harbor Islands  
408 Atlantic Avenue  
Boston, MA 02110-3350

Good Afternoon George,

Thank you very much for the personal invitation to attend the meeting held today at the North American Indian Center of Boston, regarding the Boston Harbor Islands, some of our Native American Indian concerns and the role of the Massachusetts Commission on Indian Affairs.

Unfortunately I was unable to attend the meeting due to a scheduling conflict, however I did wish to express my views and ideas. I first would like to congratulate and commend both Sammy Sapiel and Gary Mc Carrn for their efforts to ensure that the National Park Service acknowledged and respected the interests and importance of the Harbor Islands to the indigenous people of Massachusetts and surrounding states. The historical and cultural significance of these islands impacts the Aboriginal Tribes far beyond the scope of this project and any one specific period in time. As such, it is paramount that our individual and collective Tribal voices are heard and our wishes respected.

1. I feel that the role of the Massachusetts Commission on Indian Affairs is clear and should not change. They are an elected and appointed governmental entity and should have no individual or voting status. The National Park Service is, by a Presidential Executive Order, obligated to have dialog and concurrence with each Federally Recognized Tribe who has an interest in their activities. However, the Massachusetts Commission on Indian Affairs is not a Tribe, therefore the National Parks Service does not have the same obligation to them as if they were a Tribe. That does not mean that they should not have any presence. The Commission should have a presence as a non-voting exofficio on the board. They should be able to comment and contribute to the discussions however, it should be decided whether they're representing the interests state recognized Tribes or the government, since they are both.
2. It is my opinion that this draft is still in need of a great deal of work. With regard to all referencing to the Native American Indian Tribes, The names should be listed. The cultural and historical significance of the islands themselves must be noted. And very importantly, the importance of it's position as the first concentration/internment camp in what is now know as the United States of America. These areas need to properly reflect the gravity of the situation, the impact it had on not only the Wampanoag but also each of the other surrounding Tribes and our ancient habitation of those islands.
3. I would like to see the names of each of the nations listed each time the Tribes are referenced such as: The Wampanoag, Narragansett, Nipmuck, Panobscott Pequot, Mohegan etc... I do not wish to see a reference to any confederacy or confederation of nations or Tribes. The specific names of the indigenous Native American Indians of the northeast have been absent from the written history for far too long and should be recognized and listed whenever possible.
4. I would like to see more of a reference to the actual English purpose of the islands, for a concentration or forcible detainment and internment camps. How the English in fact, did not distinguish between any individual Indian, Tribe or Nation. How any indigenous person was subject to this tierney. It should be told about how the conditions there were so deplorable that it killed so many thousands of men, women and children. Also how it was a gross injustice to the Native American Indian population and how the English and other Europeans felt the rights and lives of our ancestors had minimal value and were discarded without any concern or remorse.
5. I would like to see more information about how we the indigenous people of this land used to utilize the islands and what it meant to us culturally. How to us, it is a sacred place and how we wish to honor the memory of our ancestors. There is minimal Indian cultural and historical relevance or

Wampanoag Tribe of Gay Head (Aquinnah)  
Cheryl Andrews-Maltais

- Specific tribe names have been added wherever they could be ascertained.



significance made within the draft. I would strongly recommend that the National Park Service work with the THPOs and Tribal delegates to provide more and accurate historical and culturally significant points.

6. I also strongly recommend that the board include a standing voting member seat for each of the involved and interested New England Federally Recognized Tribes and non-voting exofficio seats for representatives of each of the three other Massachusetts State Recognized Tribes. Then, as a Tribe becomes Federally Recognized, their seat would turn into a voting member seat. This would help to satisfy the National Park's obligation to confer and concur with the Federally Recognized Tribes.
7. I am very disappointed at the fact that this is a public comment session and not the required private dialog with the Federally Recognized Tribes. I would have thought that the public comment would follow the Tribal dialog, not proceed it. I will expect that the conference between the Federally Recognized Tribes and the National Parks Service will take place in the very near future. I would appreciate being notified personally of that required meeting.

Again I wish I had the opportunity to attend the meeting, contribute to the discussion and hear the input of the others present. Should you have any question or would like further discussion on any of my statements or recommendations, please feel free to call me. I can be reached at 508-627-6531. Thank you for your interest.

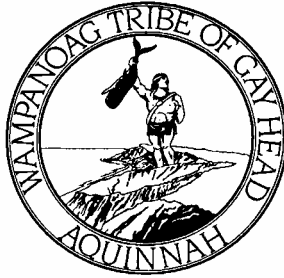
Sincerely,



Cheryl Andrews-Maltais  
Member of the Wampanoag Tribe of Gay Head (Aquinnah)

Faxed

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July 31, 2000

George E. Price  
Project Manager  
Boston Harbor Islands  
408 Atlantic Ave. Suite 228  
Boston, MA 02110-3349

**RE: Draft General Management Plan for the Boston Harbor Island, A National Park Area**

Dear Mr. Price:

The staff of the Wampanoag Tribe of Gay Head (Aquinnah), Tribal Historic Preservation Office (WTHPO) believe that the proposed Management Plan has been a successful collaborative effort to be applauded by the many partners in this project. We have also had the opportunity to review the Draft General Management Plan and have the following comments.

The WTHPO has attended many meetings concerning the involvement of the many Native American groups and feels that the inclusion on the Deer Island site is most crucial to let everyone tell their stories and oral tradition that we all hold close to our tradition handed down throughout the ages. This island is the one island that many of the Tribes involved will undoubtedly have concerns about, for their relations were involved in the internment there. The WTHPO also has concerns of the local Nipmuc Tribes not being involved throughout this whole process. Their relations were well documented in being imprisoned on Deer Island, and they have never moved from their ancestral homelands since that time.

The remaining 29 islands fall under the Wampanoag Repatriation District from which the WTHPO has assumed responsibility of Tribal Historic Preservation jurisdiction over. The WTHPO will take the lead role with all consultations pertaining to these islands under the National Historic Preservation Act (NHPA) of 1966 as amended (36 CFR 800) for any and all undertakings that would take place in this park area. The WTHPO will need to be contacted early in the consultation process and all phases of planning pertaining to any project that would have significant impact on any spiritual and cultural site.

Since the issuance of a permit by a federal agency is an Undertaking under the NHPA, we, therefore, suggest that a cultural resource management (CRM) survey be conducted by a Registered Professional Archaeologist in full compliance with Section 106 of the NHPA, whenever there will be any ground disturbing projects.

Upon receipt of this report, we will review it and make a determination of the appropriate response required. It may also be necessary for several site visits to occur; before, during or after the CRM survey is conducted, prior to any determination can be made by the WTHPO.

In the Cultural Resource Compliance Section (pgs 112-113) there was a reference concerning the compliance with Section 106 of NHPA that touched upon the nationwide Programmatic Agreement dating back to 1995. This document is no longer in compliance with the NHPA of 1966, which was amended in June of 1999, and we request a separate Memorandum of Understanding will need to be

**A FEDERALLY ACKNOWLEDGED TRIBE**

Wampanoag Tribe of Gay Head  
Tribal Historic Preservation Officer

- Reference to the 1995 Programmatic Agreement has been deleted and reference to a separate programmatic agreement included (EIS pp. 112-113).

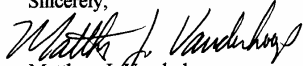
addressed for this particular undertaking. This MOU will need to have the NPS, WTHPO, State Historic Preservation Office and the Advisory Council of Historic Preservation included as signatories.

WTHPO has also reviewed the three alternative plans and our concerns are to maintain and protect the historic and cultural sites, along with flora and fauna, that are to be exposed by the general use of these lands. We feel that the education of the public should be a priority of the NPS for the preservation of historic properties and landmarks from colonial and pre-contact periods. The proposed American Indian interpretive center would be best served on one of the islands that receive the most traffic, but we strongly object to any identification of archaeological sites that pertain to our relations and history being posted and/or publicized for the public to desecrate or steal.

Please forward any project component change to the WTGH-A, THPO in writing immediately. These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800).

If you have any further questions please feel free to call me at 508.645.9265 at extension 170.

Sincerely,



Matthew J. Vanderhoop  
Tribal Historic Preservation Officer

James Peters, Massachusetts Commission of Indian Affairs, Executive Director  
Brona Simon, Massachusetts Historic Commission, Deputy State Historic Preservation Officer

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September 26, 2000

George E. Price  
Project Manager  
Boston Harbor Islands  
408 Atlantic Ave. Suite 228  
Boston, MA 02110-3349

**RE: Comments on the Draft General Management Plan for the Boston Harbor Island  
A National Park Area**

Dear Mr. Price:

The staff of the Wampanoag Tribe of Gay Head (Aquinnah), Tribal Historic Preservation Office (WTHPO) believes that the proposed Management Plan has been a successful collaborative effort to be applauded by the National Park Service (NPS) and their many partners in this project. We have also had the opportunity to review the Draft General Management Plan and have the following comments.

The WTHPO has attended many meetings concerning the involvement of the many Native American groups and feels that the inclusion on the Deer Island site is most crucial to let everyone tell their stories and oral tradition. Deer Island is the one island that many of the Tribes involved will undoubtedly have concerns about, for their relations were involved in the imprisonment and affliction there. The WTHPO also believes the local Nipmuc Tribes and the Massachusetts Commission of Indian Affairs have an equitable voice during this whole process. The WTHPO was pleased to see that all the Tribes, at our last highly successful meeting on August 6th, gladly welcomed their involvement.

The remaining 29 islands fall under the Wampanoag Repatriation District from which the WTHPO has assumed responsibility of Tribal Historic Preservation jurisdiction over. The WTHPO has assumed the lead role with all consultations pertaining to these islands under the National Historic Preservation Act (NHPA) of 1966 as amended (36 CFR 800) for any and all undertakings that would take place in this park area. The WTHPO has been active on in the consultation process and all phases of planning pertaining to the project that would have significant impact on any spiritual and cultural sites known and unknown.

The treatment of American Indians during the King Phillips War was abhorral and should not be sugar coated to be non-offensive to the visitors of this park. The true, primary source renditions and the oral histories, of the travesty that took place, should be told in a manner that would make the visitor realize the pain and suffering that the Native Americans endured during those times.

In the Cultural Resource Compliance Section (pgs 112-113) there was a reference concerning the compliance with Section 106 of NHPA that touched upon the nationwide Programmatic Agreement dating back to 1995. This document is no longer in compliance with the NHPA of 1966, which was amended in June of 1999, and we request a separate Memorandum of Understanding will need to be addressed for this particular undertaking. This MOU will need to have the NPS, WTHPO, State Historic Preservation Office and the Advisory Council of Historic Preservation included as signatories.

**A FEDERALLY ACKNOWLEDGED TRIBE**

Wampanoag Tribe of Gay Head (Aquinnah)  
Tribal Historic Preservation Officer & Deputy Tribal Preservation Officer

- Reference to the 1995 Programmatic Agreement has been deleted and reference to a separate programmatic agreement included (EIS pp. 112-113).

WTHPO has also reviewed the three alternative plans and our concerns are to maintain and protect the historic and cultural sites, along with flora and fauna, that are to be exposed by the general use of these lands. We feel that the education of the public should be a priority of the NPS for the preservation of historic properties and landmarks from colonial and pre-contact periods. The proposed American Indian interpretive center would be best served on one of the islands that receive the most passage. We strongly object to any identification of archaeological sites or our relation's burials that pertain to our relations and history being posted and/or publicized for the public to desecrate or steal. We would strongly advise that the NPS follow the Native American Grave Protection and Repatriation Act and the Commonwealth of Massachusetts Unmarked Burial Laws.


The WTHPO needs to be involved with the ethnography study and wants to enter the name of Paula Peters as the person we would like to have summative the stories from the individuals and their respective Tribes. Paula's work is well documented in her Native American Journalist Association Awards for daily writings with the Cape Cod Times, editor of the Mashpee Wampanoag award winning newsletter, Mitark, and stories for the Smithsonian Institute publications.

The last point we would like to make is the cooperation we have received from yourself and your diligent staff. We feel that the professionalism your office has shown, even in the direct fire from unnecessary critics, has lent to the WTHPO enthusiasm to participate with the NPS on this project. We hope your meeting today is successful and we would be in attendance, if it were not for the multitudes of projects that have flamed up recently.

Please forward any project component change to the WTHPO in writing immediately. These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800).

If you have any further questions please feel free to call Mark D. Harding at 508 645 9265 at extension 170.

In Peace,

  
Matthew J. Vanderhoop  
Tribal Historic Preservation Officer

  
Mark D. Harding  
Deputy Tribal Historic Preservation Officer

cc: James Peters, Massachusetts Commission of Indian Affairs, Executive Director  
Brona Simon, Massachusetts Historic Commission, Deputy State Historic Preservation Officer